

EXHIBIT 3

The Law Offices of Rudolph H. Green
2801 Stratford Dr.
Austin, TX 78746
Rudolph@rhgreenlaw.com

CEASE AND DESIST DEMAND
Pursuant to Title 17 of the United States Code

January 18, 2021

Richard Beavers
Richard Beavers Gallery
408 Marcus Garvey Boulevard
Brooklyn, NY 11216
rb@richardbeaversgallery.com

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
VIA U.S. POSTAL SERVICE
VIA E-Mail

Dear Mr. Beavers:

This law firm represents Deborah Roberts, a well-known visual artist who resides in Austin, Texas. If you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney notify us of such representation.

We are writing to notify you that (A) your promotion of the unlawful copying of Ms. Roberts' copyrighted work and (B) your sale and distribution of unlawful copies of Ms. Roberts' copyrighted work infringe upon her exclusive copyrights. Accordingly, we hereby direct you to

CEASE AND DESIST ALL COPYRIGHT INFRINGEMENT INCLUDING THE SALE AND DSITRIBUTION OF UNLAWFUL COPIES OF THE WORK OF DEBORAH ROBERTS.

Deborah Roberts is the owner of copyrights in various aspects of visual art expression. Under United States copyright law, Ms. Roberts' copyrights have been in effect since the date that each of her works was created. All copyrightable aspects of Ms. Roberts' copyrighted works are copyrighted under United States copyright law.

We understand that you have been in contact with Ms. Roberts in an effort to secure authority to exhibit and sell her work but have not been successful. It has come to our attention that, subsequent to your failure to reach an agreement with Ms. Roberts, you and your gallery's client, Lynthia Edwards, have substantially copied and offered for sale specific expressions of Ms. Roberts' work. In particular, in creating works of visual art that replicate the composition, content, style, framing, color, narrative and artistic intent of Ms. Roberts' work, you and your client have infringed and continue to infringe Ms. Roberts' exclusive copyrights. We have copies of your unlawful copies to preserve as evidence.

Deborah Roberts Copyright Infringement Cease and Desist Demand – January 18, 2021

Your actions constitute copyright infringement in violation of United States copyright laws. Under 17 U.S.C. 504, the consequences of copyright infringement include statutory damages of between \$750 and \$30,000 per work, at the discretion of the court, and damages of up to \$150,000 per work for willful infringement. If you continue to sell and offer for sale the unlawful copies of Ms. Roberts' copyrighted works or otherwise engage in copyright infringement after receiving this letter, your actions will be evidence of "willful infringement."

We demand that you immediately (A) cease and desist your promotion of the unlawful copying of Deborah Roberts' copyrighted work, (B) cease and desist the sale and distribution of unlawful copies of Deborah Roberts' copyrighted work and (C) provide us with prompt written assurance within ten (10) days that you will cease and desist from further infringement of Ms. Roberts' copyrighted works.

If you do not comply with this cease and desist demand within this time period, Ms. Roberts is entitled to use your failure to comply as evidence of "willful infringement" and seek monetary damages and equitable relief for your copyright infringement. In the event you fail to meet this demand, please be advised that Ms. Roberts has asked us to communicate to you that she will contemplate pursuing all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

Before taking these steps, however, my client wishes to give you one opportunity to discontinue your illegal conduct by complying with this demand within ten calendar (10) days. Accordingly, please sign and return the attached *Agreement* by e-mail within ten (10) days and by U.S. postal or other mail delivery service with posting date not later than ten (10) days to

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If you or your attorney have any questions, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rudolph H. Green', with a stylized flourish at the end.

Rudolph H. Green, Esq.

cc: Deborah Roberts

Attached page: **Copyright Infringement Settlement Agreement**

Deborah Roberts Copyright Infringement Cease and Desist Demand – January 18, 2021

Copyright Infringement Settlement Agreement

I, Richard Beavers, on behalf of myself and Richard Beavers Gallery, agree to immediately cease and desist copying and promoting the copying of Deborah Roberts' copyrighted works in exchange for Deborah Roberts releasing any and all claims against me for copyright infringement. In the event this agreement is breached by me, Ms. Roberts will be entitled to costs and attorney's fees in any action brought to enforce this agreement and shall be free to pursue all rights that Ms. Roberts had as of the date of this letter as if this letter had never been signed.

Signed: _____
Richard Beavers

Dated: _____